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COG OPERATING LLC
DECEMBER 31, 2018

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CONSOLIDATED SOAH DOCKET NO. 473-19-1265 2018 DEC 31 PM 12:31
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PUBLIC UTILITY COMMISSION
FILING CLERK

APPLICATION OF ONCOR	§	BEFORE THE
ELECTRIC DELIVERY CO, AEP	§	
TEXAS INC. AND LCRA	§	
TRANSMISSION SERVICES	§	STATE OFFICE
CORPORATION TO AMEND	§	
THEIR CERTIFICATES OF	§	
CONVENIENCE AND	§	OF
NECESSITY FOR 345-KV	§	
TRANSMISSION LINES IN	§	
PECOS, REEVES, AND WARD	§	ADMINISTRATIVE HEARINGS
COUNTIES, TEXAS	§	

**COG OPERATING LLC'S
MOTION TO INTERVENE**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

COMES NOW, COG Operating LLC (COG Operating or Movant) and, under P.U.C. PROC. R. §§22.103 and 22.104 and SOAH Order No. 2, timely files this Motion to Intervene in the above-referenced proceeding and in support thereof respectfully shows as follows:

I. IDENTITY OF INTERVENOR

COG Operating LLC
600 W. Illinois Avenue
Midland, Texas 79701

II. LEGAL REPRESENTATIVE

The name, mailing address, telephone number, and email address of the Movant's legal representative is:

Bradford W. Bayliff
Bayliff Law Firm PLLC
420 Crosswind Drive
Blanco, Texas 78606
(512) 480-9900 Telephone
(512) 480-9200 Facsimile
Brad@Bayliff.Law

Movant requests that all pleadings, orders, correspondence, and filings be served on its legal representative.

III. BASIS FOR INTERVENTION

COG Operating owns property that may be adversely affected, as that term is defined in P.U.C. Proc. R. §22.52(a)(3), by the proposed transmission line that is the subject of the application in this docket. Specifically, COG Operating owns property that would be affected if the project is constructed on Segment D31 included in the application. COG Operating LLC is included on the Landowner Mailing List included as part of the application Oncor and AEP filed, therefore, COG Operating has justiciable interests that may be adversely affected by the outcome of this docket and on that basis it seeks to intervene. COG Operating's interests are physically and legally distinct from any other party and no other party can adequately represent its interests. COG Operating requests this Motion to Intervene be granted and that COG Operating LLC be recognized as a party to this proceeding.

IV. ACKNOWLEDGEMENTS

COG Operating acknowledges: (1) it will be a party to the case; (2) it will be required to respond to all discovery requests from other parties in the case; (3) if COG Operating files testimony, other parties may cross-examine at a hearing any COG Operating witness(es) providing testimony in this case; (4) if COG Operating files any documents in this case, copies of those documents must be provided to every other party to this case under the rules of the Public Utility Commission of Texas and orders of the Administrative Law Judge; and (5) COG Operating is bound by the Procedural Rules of the Public Utility Commission of Texas and the State Office of Administrative Hearings.

V. CONCLUSION AND PRAYER

WHEREFORE, PREMISES CONSIDERED, COG Operating LLC respectfully requests this Motion to Intervene be granted, that COG Operating be allowed to participate as a party to this proceeding, and for such further relief to which it may be entitled.

Respectfully submitted,

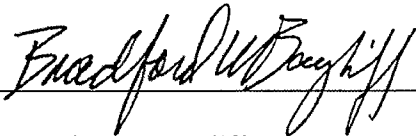
BAYLIFF LAW FIRM PLLC

420 Crosswind Drive

Blanco, Texas 78606

(512) 480-9900

(512) 480-9200 (facsimile)

By: 

Bradford W. Bayliff

State Bar No. 24012260

bbayliff@reglawfirm.com

ATTORNEY FOR

COG OPERATING LLC

CERTIFICATE OF SERVICE

I certify that on December 31, 2018, a copy of the foregoing document is being served via email, facsimile, U.S. mail, or hand delivery to all parties of record.



Bradford W. Bayliff